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<p style="text-align: right;">Page 272</p> <p>1 that is, you know, with me. So that could have 2 been from anywhere.</p> <p>3 Q I don't understand that answer. Did you 4 find this document on the street or did you find it 5 at the United Inn and Suites?</p> <p>6 A I don't know. It could have been in the 7 United Suites email.</p> <p>8 Q So it could have been a document that you 9 found on your business email account?</p> <p>10 A Yeah.</p> <p>11 Q It also could have been a hard copy 12 document?</p> <p>13 A I don't know. That's the reason I was 14 confused.</p> <p>15 Q Well, you agree with me that it looks 16 like it has been photocopied, you can see some 17 markings in the left-hand side and it is not lined 18 up properly on the page?</p> <p>19 A Right.</p> <p>20 Q Do you agree it looks like it was 21 photocopied?</p> <p>22 A I don't know.</p> <p>23 Q And there's no email that was produced in 24 this case that contains this document. Are you 25 aware of that?</p>	<p style="text-align: right;">Page 274</p> <p>1 at your property?</p> <p>2 A I don't know, you know, if I called them, 3 you know, the DeKalb County for any of these 4 crimes, these incident or not. But I don't know.</p> <p>5 Q You don't remember calling them?</p> <p>6 A No.</p> <p>7 Q Is it possible you did not call them?</p> <p>8 A I don't know.</p> <p>9 Q The next paragraph says: Please take 10 appropriate security measures to ensure the safety 11 of your patrons. Potential safety measures to 12 implement include, but are not limited to, 13 sufficient lighting, open paren, parking lots, 14 perimeter entrances, stairwells, close paren; 15 property landscaping, open paren, trimming of trees 16 slash bushes around the windows, stairways, walk 17 paths and common areas, close paren; adequate 18 security, open paren, private security, off duty 19 police, rotating days when security present, close 20 paren; proper signage slash surveillance video, 21 open paren, no loitering, unlawful activities not 22 permitted, signage about video surveillance, close 23 paren.</p> <p>24 Do you see that?</p> <p>25 A Yes.</p>
<p style="text-align: right;">Page 273</p> <p>1 A Yes.</p> <p>2 Q So you're saying you just don't know if 3 this was in a hard copy file at your business or 4 not?</p> <p>5 A That's correct.</p> <p>6 Q I wanted to ask you about -- well, let me 7 back up a second. You're not disputing that you 8 had this document in your possession though; is 9 that correct?</p> <p>10 A It could have been in an email.</p> <p>11 Q There's a list here of crimes that were 12 reported at the United Suites in Plaintiff's 13 Exhibit 2 for the period January 2017 to March 31, 14 2017. One of the crimes listed it says runaway 15 juvenile. Is that familiar to you?</p> <p>16 A No.</p> <p>17 Q Do you know what crime that is referring 18 to?</p> <p>19 A No.</p> <p>20 Q When you received this notice, did you 21 call the DeKalb County Police Department to 22 inquire?</p> <p>23 A No.</p> <p>24 Q Did you have any concerns about there 25 being a reported crime involving a runaway juvenile</p>	<p style="text-align: right;">Page 275</p> <p>1 Q Do you remember reading this letter when 2 you received it, Mr. Shareef?</p> <p>3 A I don't know. It is so long ago, so I 4 don't know.</p> <p>5 Q Well, what would be your practice in 2017 6 if you received a letter from the DeKalb County 7 Police Department, would it be important to you?</p> <p>8 A Yes, it is important. I read them and I 9 see if there is some overgrown bushes or some 10 lighting problem at the parking lot. I always have 11 the signs there no loitering, unlawful activities. 12 I always have those signs. So if somebody knock 13 down the sign, we put it back.</p> <p>14 Q We discussed in your February deposition 15 that for the years 2017 to 2019, the United Inn had 16 security at the property from the hours of 17 10:00 p.m. to 2:00 a.m.</p> <p>18 A Yes.</p> <p>19 Q But not for the other hours --</p> <p>20 A Right.</p> <p>21 Q -- is that correct?</p> <p>22 A Right.</p> <p>23 Q In other words, the United Inn for the 24 years in question had security for four hours a day 25 but not for 20 hours a day?</p>

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<p>1 A Right.</p> <p>2 Q And you told me in February that the</p> <p>3 DeKalb County Police Department recommended to you</p> <p>4 and your hotel that you have more security; is that</p> <p>5 correct?</p> <p>6 A I mean they always come in and recommend</p> <p>7 things. But I don't know if they specifically -- I</p> <p>8 mean they if they do see some sign knocked down or</p> <p>9 something, they may have, you know, tell me these</p> <p>10 things.</p> <p>11 Q Well, that's not what I'm talking about.</p> <p>12 I'm not asking you about signs. Last time in</p> <p>13 February when we talked, you said that the police</p> <p>14 came about two to three times a week for the years</p> <p>15 2017 to 2019.</p> <p>16 A Uh-huh (affirmative).</p> <p>17 Q Do you recall that?</p> <p>18 A Yes.</p> <p>19 Q And I asked you, I said Mr. Shareef, you</p> <p>20 know, at some point in time as the owner and</p> <p>21 general manager of the hotel, did you ever go to</p> <p>22 the police and say what can I do to try to prevent</p> <p>23 crime?</p> <p>24 A Uh-huh (affirmative).</p> <p>25 Q Seems like two to three visits a week</p>	<p>1 Q What does that mean?</p> <p>2 A That mean prevent the crimes.</p> <p>3 Q To take action to stop crime from</p> <p>4 happening in the future?</p> <p>5 A Uh-huh (affirmative).</p> <p>6 MR. UNDERRINGER: Object to the form.</p> <p>7 BY MR. BOUCHARD:</p> <p>8 Q Well, if you don't understand -- I mean</p> <p>9 is what I just said your understanding of</p> <p>10 prevention or do you have a different</p> <p>11 understanding?</p> <p>12 A No, I have the understanding of</p> <p>13 prevention.</p> <p>14 Q To try to avoid crime from happening in</p> <p>15 the future?</p> <p>16 A Yes.</p> <p>17 Q What do you understand this sentence to</p> <p>18 mean that I just read, the DeKalb County Police</p> <p>19 Department is able and willing to work with you on</p> <p>20 efforts to implement prevention measures at your</p> <p>21 hotel and answer any questions?</p> <p>22 A Yeah, if I have any question and they</p> <p>23 give me this phone number, I could call them.</p> <p>24 Q What about able and willing to work with</p> <p>25 you on efforts to implement prevention measures?</p>
<p>Page 277</p> <p>1 from the police is a high volume of visits. And</p> <p>2 you said that one of the things that they</p> <p>3 recommended was hiring more security. Do you</p> <p>4 remember that?</p> <p>5 MS. RICHENS: Objection to the form of</p> <p>6 the question.</p> <p>7 A I don't know.</p> <p>8 BY MR. BOUCHARD:</p> <p>9 Q But you would agree with me that from</p> <p>10 2017 to 2019, you never had security at the</p> <p>11 property outside of 10:00 p.m. to 2:00 a.m.?</p> <p>12 A I don't.</p> <p>13 Q You do not agree or you do agree?</p> <p>14 A I agree that I have security only on</p> <p>15 those times.</p> <p>16 Q The last paragraph for Plaintiff's</p> <p>17 Exhibit 2 says, quote, the DeKalb County Police</p> <p>18 Department is able and willing to work with you on</p> <p>19 efforts to implement prevention measures at your</p> <p>20 hotel and answer any questions.</p> <p>21 Do you see what I just read?</p> <p>22 A Yes.</p> <p>23 Q What do you understand the word</p> <p>24 prevention to mean?</p> <p>25 A Prevent the crime.</p>	<p>Page 279</p> <p>1 A Meaning that, you know, if they need to,</p> <p>2 you know, talk to me and maybe suggest something.</p> <p>3 Q Did you ever ask them to work with you on</p> <p>4 efforts to implement prevention measures?</p> <p>5 A No. I have these officer, they are from</p> <p>6 the same department. I talk with them all the</p> <p>7 time. They work for me. They come every night.</p> <p>8 So those are the, you know, question I tell them,</p> <p>9 you know, that we need to -- what we can do. And</p> <p>10 they always, you know, suggested that, you know, we</p> <p>11 have a problem, call 911, call the cops.</p> <p>12 Q Other than Weber and McClelland who I</p> <p>13 believe you're referring to right now.</p> <p>14 A Yes.</p> <p>15 Q Did you ever ask the DeKalb County Police</p> <p>16 Department to work with you on efforts to implement</p> <p>17 prevention measures at the hotel?</p> <p>18 A I don't know.</p> <p>19 Q Well, you understand that you're the</p> <p>20 30(b)(6) representative for Northbrook Industries,</p> <p>21 Inc. on the topic of, among others, security at the</p> <p>22 property. This is my only opportunity before</p> <p>23 trial, Mr. Shareef, to understand what security</p> <p>24 measures for example the hotel had in effect during</p> <p>25 the relevant period. Do you understand that?</p>

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<p>1 A Yes.</p> <p>2 Q Are you prepared to testify today?</p> <p>3 A I am.</p> <p>4 Q Did the hotel or did not the hotel take</p> <p>5 on the DeKalb County Police Department's request</p> <p>6 and offer -- let me strike that and ask it again.</p> <p>7 At any point in time did the United Inn</p> <p>8 and Suites ask the DeKalb County Police Department</p> <p>9 to work with it on efforts to implement prevention</p> <p>10 measures at the hotel?</p> <p>11 A Like I said, I talked to the Sergeant</p> <p>12 Weber and Sergeant McClelland, so they are the</p> <p>13 representative, you know, from the Police</p> <p>14 Department, same department which you asked me, you</p> <p>15 know, what I have done. So this is my main source,</p> <p>16 so I always seek help from them.</p> <p>17 Q Other than them, the answer is no?</p> <p>18 A That's right.</p> <p>19 Q And they were working in an off-duty</p> <p>20 capacity from 10:00 p.m. to 2:00 a.m.?</p> <p>21 A Yes.</p> <p>22 Q The rest of the day they were not working</p> <p>23 at the property, they were working for the DeKalb</p> <p>24 County Police Department or they were at home or</p> <p>25 doing something else, right?</p>	<p>1 Department to do a security assessment of your</p> <p>2 property?</p> <p>3 A No.</p> <p>4 Q Did you ever ask the DeKalb County Police</p> <p>5 Department to do an assessment of measures you</p> <p>6 could put in effect to reduce crime on the</p> <p>7 property?</p> <p>8 A Again, my source is those police officer.</p> <p>9 They are there and I meet them almost nightly</p> <p>10 basis. So I ask them, you know, if there's</p> <p>11 anything -- if there's any question, so I might</p> <p>12 have asked them. I don't know. This is 2017.</p> <p>13 Q This letter didn't come from Weber or</p> <p>14 McClelland, correct?</p> <p>15 A Uh-huh (affirmative).</p> <p>16 Q Is that right?</p> <p>17 A Yes.</p> <p>18 Q It came from a Major Padrick, right?</p> <p>19 A Okay. Yes.</p> <p>20 Q And McClelland and Weber were working at</p> <p>21 the United Inn in an off-duty capacity four hours</p> <p>22 per day prior to this letter being sent to you,</p> <p>23 right?</p> <p>24 A Yes.</p> <p>25 Q Did the United Inn take any action based</p>
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<p>1 MR. UNDERRINER: Object to form.</p> <p>2 A Maybe.</p> <p>3 BY MR. BOUCHARD:</p> <p>4 Q I mean did they work at your hotel the</p> <p>5 other 20 hours per day?</p> <p>6 A No.</p> <p>7 Q And have you produced all the text</p> <p>8 messages in this case that you have from the years</p> <p>9 2017 to '19 with Weber and/or McClelland?</p> <p>10 A I guess so.</p> <p>11 Q So when you say you were communicating</p> <p>12 with them all the time, that would be reflected in</p> <p>13 the text messages you produced?</p> <p>14 A Yes.</p> <p>15 Q Did you ever ask the DeKalb County Police</p> <p>16 Department to help train your staff on sex</p> <p>17 trafficking?</p> <p>18 A Did I ever ask. No.</p> <p>19 Q Or on commercial sex activity?</p> <p>20 A No.</p> <p>21 Q Did you ever ask the DeKalb County Police</p> <p>22 Department to train your staff on indicators of</p> <p>23 crime?</p> <p>24 A Did I ask them. No.</p> <p>25 Q Did you ever ask the DeKalb County Police</p>	<p>1 on this letter, Plaintiff's Exhibit 2?</p> <p>2 A We might have. Like I told you, whatever</p> <p>3 we think is appropriate to help, we do it.</p> <p>4 Q What I'm asking is in response to your</p> <p>5 receiving Plaintiff's Exhibit 2, did the hotel</p> <p>6 implement some new security measure?</p> <p>7 A Some new security measure. I don't know.</p> <p>8 I think that's -- I don't know but we might have.</p> <p>9 I don't know.</p> <p>10 Q Did the hotel continue doing what it had</p> <p>11 always done as it relates to security after it</p> <p>12 received Plaintiff's Exhibit 2?</p> <p>13 MR. UNDERRINER: Object to the form.</p> <p>14 A Can you repeat the question.</p> <p>15 BY MR. BOUCHARD:</p> <p>16 Q Yeah. You told me that Weber and</p> <p>17 McClelland were working four hours per day --</p> <p>18 A Uh-huh (affirmative).</p> <p>19 Q -- prior to receipt of this letter in</p> <p>20 2017, right?</p> <p>21 A Yes.</p> <p>22 Q After you received this letter, that is</p> <p>23 Plaintiff's Exhibit 2, did you ask Weber or</p> <p>24 McClelland to start working more hours per day?</p> <p>25 A No.</p>

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<p style="text-align: right;">Page 284</p> <p>1 Q Did you ask other security to come in and 2 start working other hours during the day? 3 A No. 4 Q Did you implement any other new security 5 measures after receiving Plaintiff's Exhibit 2 6 based on Plaintiff's Exhibit 2? 7 A No. 8 Q So as the owner of the hotel, it is not 9 like you got Plaintiff's Exhibit 2 and you said 10 wow, I am going to implement some new security 11 measures based on what I am reading here? 12 MR. UNDERRINER: Object to the form. 13 BY MR. BOUCHARD: 14 Q I didn't hear your answer, sir. 15 A I don't know how to answer it. But 16 again, you know, I pass whatever information to my 17 officers, and that's my best source because they 18 working on the same department and they are very, 19 you know, qualified people. 20 (Plaintiff's Exhibit 3 marked) 21 BY MR. BOUCHARD: 22 Q I'm showing the witness Plaintiff's 23 Exhibit 3 which is Bates stamped NBI 03765 and 24 NBI 03766 through NBI 03774. 25 Mr. Shareef, I have handed you what's</p>	<p style="text-align: right;">Page 286</p> <p>1 produced in this case? 2 A The documents, you got it from your -- 3 from my United Inn email. You know, that's a long 4 time ago. I did not, you know, read, you know, 5 lately what is there. 6 Q No. I'm talking about documents that 7 were produced for the first time last week. Have 8 you read these documents, Mr. Shareef? 9 A From the emails? What is the question? 10 Which documents you are -- I don't know. 11 Q The whole reason that we're here today is 12 because there were documents produced after you 13 were deposed in February. 14 A Okay. 15 Q Do you understand that? 16 A Yes. 17 Q In fact, those documents were produced 18 last week. Do you understand that? 19 A Via email. Via ... 20 Q The documents were provided from your 21 lawyer to me last week. Do you understand that? 22 A Yes. 23 Q Have you reviewed those documents in 24 connection with getting ready for your deposition 25 today, Mr. Shareef?</p>
<p style="text-align: right;">Page 285</p> <p>1 been marked as Plaintiff's Exhibit 3 which is an 2 email and the attachment to the email. Do you see 3 that? 4 A Yes. 5 Q And it is an email from Chief Sumlin to 6 the hotel's email account at Gmail. Do you see 7 that? 8 A Yes. 9 Q Dated November 14th, 2017; is that right? 10 A Yes. 11 Q And this is about seven months after the 12 date on Plaintiff's Exhibit 2, that letter we were 13 just looking at from the DeKalb County Police 14 Department; is that right? 15 A Yes. 16 Q Are you familiar with this email and the 17 Proposal for Security Services attached to it? 18 A Yes, I have seen it. 19 Q You're familiar with it? 20 A I may have seen this one that time. I 21 may have talked to him. I don't know. 22 Q Did you review any documents to prepare 23 for your deposition today? 24 A No, I did not. 25 Q Have you reviewed the documents that you</p>	<p style="text-align: right;">Page 287</p> <p>1 A I have seen some. But I don't know, what 2 is -- how many of them you get it via email? 3 THE WITNESS: Is that that email we 4 talking about here? Which document he's 5 concerning? 6 MS. RICHENS: You received this by email. 7 THE WITNESS: Email. Yeah. 8 MS. RICHENS: He's asking if you remember 9 receiving it? 10 BY MR. BOUCHARD: 11 Q Well, actually that's not what I'm 12 asking. 13 A Okay. 14 Q I'm asking if you have reviewed the 15 documents that your lawyers produced to me last 16 week in this case? 17 A No. 18 Q You did not? 19 A No. 20 Q But you're prepared to give testimony 21 today on behalf of the corporation? 22 A But I don't know that this the document, 23 you know, I'll see and I have to remember, you 24 know, what happened in 2017. 25 Q Well, I'm not asking you to remember</p>

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<p>1 A Yes.</p> <p>2 Q Do you agree with me that it looks like,</p> <p>3 according to Plaintiff's Exhibit 3, Brown</p> <p>4 Protective Services would have been available 24</p> <p>5 hours a day?</p> <p>6 A Yes.</p> <p>7 Q Did you receive proposals from any other</p> <p>8 security service providers that would have provided</p> <p>9 you with 24-hour security at the hotel?</p> <p>10 A I don't know.</p> <p>11 MR. UNDERRINER: Object to the form.</p> <p>12 BY MR. BOUCHARD:</p> <p>13 Q You don't recall?</p> <p>14 A I don't know.</p> <p>15 Q Well, do you believe that you received</p> <p>16 other proposals like this one around that time in</p> <p>17 2017 when you were shopping?</p> <p>18 A I don't know.</p> <p>19 Q Well, you have testified earlier today</p> <p>20 that in 2017 you reached out and requested</p> <p>21 proposals either by email or phone from other</p> <p>22 security providers, right?</p> <p>23 A Yes.</p> <p>24 Q Do you think Brown Protective Services</p> <p>25 was the only service provider that you reached out</p>	<p>1 Q And you do not recall why?</p> <p>2 A I don't know.</p> <p>3 Q And you didn't decide in November 2017 or</p> <p>4 thereafter to hire any other private security</p> <p>5 company to provide additional security at the</p> <p>6 property; is that correct?</p> <p>7 A I may have. I don't know.</p> <p>8 Q Well, I think the answer is no. But let</p> <p>9 me ask again.</p> <p>10 A Uh-huh (affirmative).</p> <p>11 Q Between 2017 and 2019, other than Weber</p> <p>12 and McClelland, did you at any time have any other</p> <p>13 private security at the hotel?</p> <p>14 A No.</p> <p>15 Q So you've never hired another private</p> <p>16 security company?</p> <p>17 A No.</p> <p>18 Q Correct?</p> <p>19 A That's right.</p> <p>20 Q So we don't know if you got any other</p> <p>21 proposals other than this proposal in Plaintiff's</p> <p>22 from Brown Protective Services. But regardless,</p> <p>23 you didn't hire anybody else, right?</p> <p>24 A Right.</p> <p>25 Q And what I don't understand is why you</p>
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<p>1 to or do you think there were others?</p> <p>2 A Maybe. I don't know. Maybe there are</p> <p>3 other.</p> <p>4 Q Do you think there were or do you not</p> <p>5 think there were?</p> <p>6 A I don't know.</p> <p>7 Q But you're the only person who would know</p> <p>8 that, right, Mr. Shareef?</p> <p>9 A Right.</p> <p>10 Q And your testimony is I just don't know?</p> <p>11 A I mean yeah, I don't know. That's the</p> <p>12 best I can remember.</p> <p>13 Q Where did you get the name Brown</p> <p>14 Protective Services from?</p> <p>15 A Maybe he left a card there. He left a</p> <p>16 business card there. I don't know how, you know, I</p> <p>17 had contact with him.</p> <p>18 Q Why did you not hire them?</p> <p>19 A For maybe any reason. I don't know. I</p> <p>20 don't even recall, you know, what the conversation</p> <p>21 was with him. But I don't have the answer.</p> <p>22 Q You received this proposal in</p> <p>23 November 2017, but you decided not to hire Brown</p> <p>24 Protective Services?</p> <p>25 A Yes.</p>	<p>1 didn't hire more security?</p> <p>2 A There could be their timing issue or my</p> <p>3 timing issue or some other -- I don't know.</p> <p>4 (Plaintiff's Exhibit 4 marked)</p> <p>5 BY MR. BOUCHARD:</p> <p>6 Q Mr. Shareef, I'm handing you what's been</p> <p>7 marked as Plaintiff's Exhibit 4. And Plaintiff's</p> <p>8 Exhibit 4 is Bates stamped NBI 2566 to 67.</p> <p>9 Mr. Shareef, page 1 of Plaintiff's Exhibit 4 is a</p> <p>10 Business Record Certification in the United States</p> <p>11 District Court for the Northern District of Georgia</p> <p>12 and the second page of Plaintiff's Exhibit 4 is a</p> <p>13 Waiver of Appearance and Document Receipt. Do you</p> <p>14 see that?</p> <p>15 A Yes.</p> <p>16 Q The second page of Plaintiff's Exhibit 4</p> <p>17 is captioned Northern District of Georgia, In Re:</p> <p>18 Grand Jury Proceedings, the second page. Do you</p> <p>19 see that at the top of the document?</p> <p>20 A Yes.</p> <p>21 Q Did United Inn and Suites receive a</p> <p>22 federal grand jury subpoena in 2017?</p> <p>23 A Are you talking about this one?</p> <p>24 Q I'm asking did United Inn and Suites</p> <p>25 receive a federal grand jury subpoena in 2017?</p>

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<p style="text-align: right;">Page 312</p> <p>1 A Underage person. 2 (Plaintiff's Exhibit 8 marked)</p> <p>3 BY MR. BOUCHARD:</p> <p>4 Q I'm showing you what's been marked as 5 Plaintiff's Exhibit 8. This is another email from 6 Investigator Wade. If you compare it to 7 Plaintiff's Exhibit 7, you'll see that it was sent 8 one second after Plaintiff's Exhibit 7. Do you see 9 that?</p> <p>10 A Yes.</p> <p>11 Q And this email has a subject line that 12 says Missing Juvenile; is that right?</p> <p>13 A Right.</p> <p>14 Q And it has an attachment to it. Do you 15 see that? I'm going to give you the attachment in 16 a second. But underneath the subject line it says 17 Attachments.</p> <p>18 A Yes.</p> <p>19 Q This is an email that the United Inn and 20 Suites received; is that correct?</p> <p>21 A Yes.</p> <p>22 Q Because it was sent, again, to the same 23 email address as Plaintiff's Exhibit 7?</p> <p>24 A Right.</p> <p>25 (Plaintiff's Exhibit 9 marked)</p>	<p style="text-align: right;">Page 314</p> <p>1 about the -- some crimes. Maybe that's coming from 2 there. I don't recall.</p> <p>3 Q I can represent to you that it means be 4 on the lookout for. Is that new information to you 5 or is that something you're aware of?</p> <p>6 A No, I certainly don't call this 7 abbreviation -- don't recall this abbreviation.</p> <p>8 Q Recall this?</p> <p>9 A Abbreviation.</p> <p>10 MR. UNDERLINER: Abbreviation.</p> <p>11 BY MR. BOUCHARD:</p> <p>12 Q Abbreviation. But you see underneath 13 BOLO it says Missing Person?</p> <p>14 A Right.</p> <p>15 Q And you understand what that means?</p> <p>16 A Uh-huh.</p> <p>17 Q Right?</p> <p>18 A Yes.</p> <p>19 Q And it says that Rockdale County is 20 looking for this missing person, correct?</p> <p>21 A Yes.</p> <p>22 Q As of October 9th, 2018, correct?</p> <p>23 A Yes.</p> <p>24 Q And the email that you received from Tim 25 Wade, which is Plaintiff's Exhibit 8, was dated</p>
<p style="text-align: right;">Page 313</p> <p>1 BY MR. BOUCHARD:</p> <p>2 Q I'm showing you Plaintiff's Exhibit 9 3 which is Bates stamped NBI 3107. This was attached 4 to the email Plaintiff's Exhibit 8 that we were 5 just looking at, Mr. Shareef. Did you open up that 6 email that we were just looking at and the 7 attachment to it when you received it in 8 October 2018?</p> <p>9 A I don't know. But I may have.</p> <p>10 Q Do you recall seeing this notice which is 11 Plaintiff's Exhibit 9?</p> <p>12 A No, I don't recall.</p> <p>13 Q Is this the first time you're seeing 14 this?</p> <p>15 A Yes.</p> <p>16 Q You have not seen this prior to today?</p> <p>17 A No.</p> <p>18 Q Do you know what BOLO stands for?</p> <p>19 A BOLO stand for?</p> <p>20 Q B-O-L-O.</p> <p>21 A BOLO stand for.</p> <p>22 Q Do you know what that means, BOLO?</p> <p>23 A I don't recall. But I may have sitting 24 in one of the Police, Sheriff, or maybe DeKalb 25 County Police meeting and we got some material</p>	<p style="text-align: right;">Page 315</p> <p>1 October 29th, 2018, right?</p> <p>2 A Yes.</p> <p>3 Q So at this point according to my math she 4 had been missing for about 20 days?</p> <p>5 A Yes.</p> <p>6 Q And it provides a photo of her?</p> <p>7 A Uh-huh.</p> <p>8 Q Is that correct?</p> <p>9 A Uh-huh (affirmative).</p> <p>10 Q And remember, sir, we need audible yes or 11 nos.</p> <p>12 A Yes. I'm sorry about that.</p> <p>13 Q And it provides her name?</p> <p>14 A Yes.</p> <p>15 Q J.G., do you see that?</p> <p>16 A Yes.</p> <p>17 Q Who is J.G. in this lawsuit against 18 United Inn and Suites.</p> <p>19 A Yes.</p> <p>20 Q Do you understand that?</p> <p>21 A Yes.</p> <p>22 Q And it also provides her age, race, hair 23 color, eye color, height, and weight.</p> <p>24 A Yes.</p> <p>25 Q Do you see that?</p>

<p>1 A Yes.</p> <p>2 Q It says a little bit further down on Plaintiff's Exhibit 9: Anyone with information about this case is asked to contact, and it provides office, cell numbers, and a 24-hour number to contact. Do you see that?</p> <p>7 A Yes.</p> <p>8 Q If I heard you correctly, Mr. Shareef, you have not ever seen Plaintiff's Exhibit 9 before today; is that correct?</p> <p>11 A That maybe 2017 we will seen it when we open the email. I'm going to give you example. I don't know if that works or not. There are few missing person when police officer came. We put it in our office bulletin board, we put it there and it stay there. But I don't remember all these names.</p> <p>18 Q How many missing person reports have you received regarding minors?</p> <p>20 A Right. Minors, I don't know about the minor report. But the missing person, I mean even right now in my, you know, front desk we have maybe ten pictures missing persons.</p> <p>24 Q Are any of them minors?</p> <p>25 A It could have been. I don't know. I</p>	<p>Page 316</p> <p>1 unable to discern whether somebody looks like a minor or not?</p> <p>3 MR. UNDERRINER: Object to the form.</p> <p>4 A Looking at this picture, yes.</p> <p>5 BY MR. BOUCHARD:</p> <p>6 Q Based on this photo you cannot tell --</p> <p>7 A I cannot.</p> <p>8 Q -- if she looks like a minor?</p> <p>9 A I cannot.</p> <p>10 Q But you know that it says her current age is 16?</p> <p>12 A I can read.</p> <p>13 Q Did you ever contact Investigator Wade?</p> <p>14 A I might have been. I don't know what I respond via email or anything, you know. What record, you know, they ask me if I had the record. I must have send it to them whatever question they have.</p> <p>19 Q It is okay if the answer is no or I don't know. My question was very straightforward.</p> <p>21 A Right.</p> <p>22 Q Did you ever contact Investigator Wade?</p> <p>23 A Again, I don't know. Maybe I have been.</p> <p>24 Q You may have, you may have not?</p> <p>25 A Right.</p>
<p>1 don't recall right now.</p> <p>2 Q Well, I don't know what other notices you may have at your front desk right now. But Plaintiff's Exhibit 9 identifies J.G., J.G. as a minor --</p> <p>6 A Right.</p> <p>7 Q -- is that correct?</p> <p>8 A Yes.</p> <p>9 Q And she looks like a minor in this photo, does she not?</p> <p>11 A I don't know.</p> <p>12 MS. RICHENS: Objection as to form.</p> <p>13 BY THE VIDEOGRAPHER:</p> <p>14 Q Well, I'm asking for your perception, Mr. Shareef.</p> <p>16 A I don't know. I cannot say anything about this.</p> <p>18 Q You have no opinion whatsoever?</p> <p>19 A No.</p> <p>20 Q You are responsible for the security at the property; is that true?</p> <p>22 A Uh-huh (affirmative). Yes.</p> <p>23 Q As the general manager?</p> <p>24 A Right.</p> <p>25 Q And your position is that you are totally</p>	<p>Page 317</p> <p>1 Q You do not know; is that true?</p> <p>2 A I do not know.</p> <p>3 Q Do you have any knowledge of whether Mr. Islam contacted Investigator Wade?</p> <p>5 A I don't think so. But this inspector may come back and, you know, talk to him. I don't know.</p> <p>8 Q Do you have a recollection of Investigator Wade ever coming to the United Inn and Suites?</p> <p>11 A No.</p> <p>12 Q You do not recall?</p> <p>13 A No.</p> <p>14 Q Mr. Shareef, do you agree with me that there being a missing youth who is suspected of being at the United Inn and Suites is a priority matter?</p> <p>18 MR. UNDERRINER: Object to form.</p> <p>19 MS. RICHENS: Same objection.</p> <p>20 A I don't know how to answer that.</p> <p>21 BY MR. BOUCHARD:</p> <p>22 Q As the owner and general manager, would it concern you if a police officer called you and said we have a credible lead that there's a missing minor at your hotel?</p>

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<p style="text-align: right;">Page 320</p> <p>1 MS. RICHENS: Objection as to form. 2 A I mean they always come and they ask this 3 question. And like I said, I give them the record, 4 I open the door. If they says look I think, you 5 know, that such and such room we need to check. So 6 I always help them. But that's my concern, if 7 there is any, I help them. So I don't know what -- 8 how to answer you. Concern me, of course concern 9 me and I help them solve the issue.</p> <p>10 BY MR. BOUCHARD:</p> <p>11 Q Well, that's an answer. 12 A Okay. 13 Q Yes, it concerns you if there's -- 14 A Okay. 15 Q -- a missing minor at the hotel? 16 A Okay. 17 Q Is that correct? 18 A Yes. 19 Q Would you want to it concern the staff at 20 the hotel too? 21 A Yes. 22 Q Would you train your staff to care about 23 things like that? 24 A Yeah. They have -- they have known, you 25 know, if they see some suspicious thing, they tell</p>	<p style="text-align: right;">Page 322</p> <p>1 Q Did the hotel receive this email as well? 2 A Yes. 3 Q Did you review this email? 4 A Yes. 5 Q And you see it says Subject Missing 6 Person; is that right? 7 A Right. 8 Q And the body of the email says: Ashar 9 was advised by her guardian that she was staying at 10 United Inn located at 4649 Memorial Drive. Thank 11 you for your help. 12 Do you see that? 13 A Right. 14 Q And as you can see, there's an attachment 15 to Plaintiff's Exhibit 10 which is identical to the 16 BOLO notice that we already looked at. 17 A Right. 18 Q Do you recall that? 19 A Right. 20 Q Mr. Shareef, we have talked about three 21 emails from Investigator Wade on October 29th, 2018 22 and two BOLO notices. What, if anything, did the 23 United Inn do in response to these emails and these 24 BOLO notices? 25 A The response would be if I see this girl,</p>
<p style="text-align: right;">Page 321</p> <p>1 me. I talk to other -- you know, they can call the 2 police, you know, or they call 911 or they tell me, 3 I call my police officer. Most the time call the 4 local police.</p> <p>5 MS. RICHENS: David, may we take a quick 6 break?</p> <p>7 MR. BOUCHARD: Sure.</p> <p>8 THE VIDEOGRAPHER: Off the record at 9 2:29 p.m.</p> <p>10 (Recess 2:29-2:41 p.m.)</p> <p>11 THE VIDEOGRAPHER: Back on the record at 12 2:41 p.m.</p> <p>13 (Plaintiff's Exhibit 10 marked)</p> <p>14 BY MR. BOUCHARD:</p> <p>15 Q Mr. Shareef, I'm handing you what's been 16 marked as Plaintiff's Exhibit 10 which is Bates 17 stamped NBI 3097 to 3098. Do you see that, 18 Mr. Shareef?</p> <p>19 A Yes.</p> <p>20 Q And you see it is another email from 21 Investigator Tim Wade on October 29th, 2018?</p> <p>22 A Yes.</p> <p>23 Q And it is also to 24 unitedinn4649@gmail.com?</p> <p>25 A Right.</p>	<p style="text-align: right;">Page 323</p> <p>1 we notify whoever is, you know, concerning about 2 this email, this time this Mr. T. Wade. So that's 3 what it is.</p> <p>4 Q I can represent to you, Mr. Shareef, that 5 I did not see a response to Investigator Wade in 6 your emails. Do you believe that you did respond 7 to Investigator Wade?</p> <p>8 A We may have communicated via phone with 9 Wade.</p> <p>10 Q Do you recall doing so?</p> <p>11 A No.</p> <p>12 Q Do you know if anybody else on behalf of 13 United Inn communicated with Investigator Wade?</p> <p>14 A I see this email name Ashar, so might 15 have talked to Ashar and Ashar talk to him.</p> <p>16 Q Did you ever communicate with Ashar about 17 his communication with Investigator Wade?</p> <p>18 A Maybe that time. But I don't know.</p> <p>19 Q You don't recall as you --</p> <p>20 A No.</p> <p>21 Q -- sit here today?</p> <p>22 A No.</p> <p>23 Q Do you recall whether you held a staff 24 meeting to talk about these missing juvenile 25 notices?</p>

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<p style="text-align: right;">Page 324</p> <p>1 A No. 2 Q You did not hold one or you do not 3 recall? 4 A I do not recall. 5 Q Did you post a photo of J.G. at the 6 hotel? 7 A I may have. But I don't recall. 8 Q Where would you have posted it? 9 A Post it in the office where everybody 10 comes in every day. 11 Q Where is that? 12 A It is in the office. 13 Q Are you talking about in the lobby? 14 A No, not lobby. In the office back, I can 15 say back of the office. 16 Q Who goes in there every day? 17 A All the employees go there. 18 Q Would you have made an announcement to 19 all the employees that you have just posted this 20 new photo of a missing juvenile reported to be at 21 the hotel? 22 A I don't recall. 23 Q Did you send this photo of J.G. to 24 Sergeant Weber? 25 A I may have, you know, talked with him the</p>	<p style="text-align: right;">Page 326</p> <p>1 are there, so you look around and see if the person 2 you see. Maybe they are around and sometime 3 they're not there, you know. 4 Q Are you testifying to something that 5 might have happened or that you recall happening? 6 A No. No. I am testifying that when any 7 picture -- 8 Q Well, I'm not talking about any picture. 9 I'm specifically asking do you recall sharing this 10 photo of J.G. with Weber and McClelland? 11 A I may have tell them that look at that 12 board there, we put the picture there. Other than 13 that I don't recall. 14 Q You may have told them? 15 A Yeah. 16 Q But you may have not told them; is that 17 what you're saying? 18 A I don't recall. 19 Q You do not recall -- 20 A Yeah. 21 Q -- if you told them? 22 A Yeah. 23 Q Correct? 24 A I don't recall what I tell them is what I 25 am saying.</p>
<p style="text-align: right;">Page 325</p> <p>1 same night, you know, look at that, you know, photo 2 or something. We may have talked. 3 Q You do not recall? 4 A I don't recall. 5 Q What about Sergeant McClelland? 6 A I don't recall. 7 Q If you had sent it to either of those 8 gentlemen, you would have sent it to them by text 9 message; is that correct? 10 A I sent them a text message or maybe I 11 called them and said look, when you come in, you 12 know, look at this picture, you know, see if you 13 see this, you know, person. 14 Q Well, I can represent to you that I have 15 what I believe are your text messages from 2017 to 16 2019 with Weber and McClelland. I have not seen a 17 text message with that photo. 18 A Okay. 19 Q Is there some other way you might have 20 sent her photo to Weber or McClelland or is there 21 no other way other than by text message? 22 A I mean they come there every day, so we 23 just tell them look at this picture, you know, when 24 you come in. Because maybe we didn't see such and 25 such person, you know, so we tell them look, you</p>	<p style="text-align: right;">Page 327</p> <p>1 Q Is it possible you did not tell them 2 about this photo? 3 A I don't know. 4 Q I am taking it the answer is no because 5 we have beaten this drum about the security at the 6 hotel. But I need to ask just to be sure. Did the 7 hotel hire any additional security after receiving 8 this photo of J.G.? 9 A No. 10 Q Did the hotel ask Weber or McClelland to 11 work more than four hours per day after receiving 12 this photo of J.G.? 13 A Hotel asked them to when they are, you 14 know, in the DeKalb County when they are in this 15 area, they come and, you know, visit more often 16 there daytime when they working on their regular 17 job, so they come visit, you know. 18 Q Did the hotel ask them to work more than 19 four hours a day after receiving this photo of 20 J.G.? 21 A No. 22 Q Did you ask the DeKalb Police Department 23 to help the hotel implement prevention efforts 24 after receiving this photo of J.G.? 25 A I don't recall.</p>

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<p style="text-align: right;">Page 344</p> <p>1 Q Yeah. After you hired a lawyer, did you 2 decide whether or not to pay the fines that the 3 DeKalb County Code Enforcement Division had 4 assessed on the United Inn and Suites?</p> <p>5 A Right.</p> <p>6 Q And your decision was to pay the fines; 7 is that correct?</p> <p>8 A Yes.</p> <p>9 (Plaintiff's Exhibit 15 marked)</p> <p>10 BY MR. BOUCHARD:</p> <p>11 Q Showing you Plaintiff's Exhibit 15, which 12 is Bates stamped NBI 2431 to 2432. Mr. Shareef, 13 Plaintiff's Exhibit 15 is on page 1 a Deferred 14 Sentencing Order and on page 2 a cashier's check. 15 Do you see that?</p> <p>16 A Yes.</p> <p>17 Q The Deferred Sentencing Order says in the 18 first paragraph -- well, actually let me back up. 19 The Deferred Sentencing Order says at the top In 20 the Magistrate Court of DeKalb County, State of 21 Georgia, State of Georgia versus Northbrook 22 Industries, Inc. d/b/a United Suites; is that 23 right?</p> <p>24 A That's right.</p> <p>25 Q Is that your hotel?</p>	<p style="text-align: right;">Page 346</p> <p>1 Q And as you said, you decided to pay the 2 fine --</p> <p>3 A Right.</p> <p>4 Q -- is that right?</p> <p>5 And that is reflected on page 2 of 6 Plaintiff's Exhibit 15; is that correct?</p> <p>7 A Right.</p> <p>8 Q The cashier's check for \$60,345?</p> <p>9 A Right.</p> <p>10 Q And your understanding was that that was 11 the fine for violations of the DeKalb County code?</p> <p>12 A Right.</p> <p>13 (Plaintiff's Exhibit 16 marked)</p> <p>14 BY MR. BOUCHARD:</p> <p>15 Q Showing you Plaintiff's Exhibit 16 which 16 I only printed one copy of. Even I don't have a 17 copy of it because it is so voluminous. But it is 18 Bates stamped NBI 971 to NBI 1228.</p> <p>19 MS. RICHENS: What's happening, is there 20 just the original?</p> <p>21 MR. BOUCHARD: Yeah. I just said on the 22 record that I have only printed one because it is 23 258 pages.</p> <p>24 MS. RICHENS: Okay.</p> <p>25</p>
<p style="text-align: right;">Page 345</p> <p>1 A Yes.</p> <p>2 Q And it says in the first paragraph of 3 this Deferred Sentencing Order: The Defendant 4 having come before the Court today on the 5 above-referenced charges, has entered a plea of 6 guilty slash nolo and the Court has accepted the 7 Defendant's plea. A final sentencing hearing in 8 this matter will be held at 2:00 p.m. on July 16th, 9 2018 in the Magistrate Court of DeKalb County 10 located at, and it provides the address. As such, 11 the Defendant is hereby ordered to appear at said 12 sentencing hearing.</p> <p>13 Do you see that?</p> <p>14 A Yes.</p> <p>15 Q The next paragraph says: The Court is 16 currently considering sentencing the Defendant to 17 pay a fine and state-imposed fees totaling \$60,345. 18 If the Defendant pled guilty or nolo and it elects 19 to pay the fine and fees under consideration as a 20 sentence to the Clerk of the Magistrate Court of 21 DeKalb County on or before the sentencing hearing, 22 the Court will impose the fine and fees as detailed 23 as the sentence in this case.</p> <p>24 Do you see that?</p> <p>25 A Yes.</p>	<p style="text-align: right;">Page 347</p> <p>1 BY MR. BOUCHARD:</p> <p>2 Q Mr. Shareef, I can represent to you that 3 on the first page of Plaintiff's Exhibit 16, you 4 should see reference to the word Receipt. And what 5 I understand Plaintiff's Exhibit 16 --</p> <p>6 MS. RICHENS: May we take a quick look?</p> <p>7 MR. BOUCHARD: Yeah.</p> <p>8 BY MR. BOUCHARD:</p> <p>9 Q Do you see on the first page of 10 Plaintiff's Exhibit 16 there's a reference to 11 Receipt?</p> <p>12 A Yes.</p> <p>13 Q And I understand Plaintiff's Exhibit 16 14 outlines the violations at the United Inn and 15 Suites of the DeKalb County code defined for each 16 of those violations and then on the very last page 17 tells you the total fine owed.</p> <p>18 A Right.</p> <p>19 Q So if you flip to page 258 of Plaintiff's 20 Exhibit 16, the very last page, you should see the 21 total amount of the fine is \$60,345.</p> <p>22 A Yes.</p> <p>23 Q And you see the amount paid is \$60,345?</p> <p>24 A Right.</p> <p>25 Q Which is what we just saw in the</p>

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<p style="text-align: right;">Page 368</p> <p>1 Q Have you had a chance to review them?</p> <p>2 A I see them.</p> <p>3 Q Is this the total set of your text</p> <p>4 messages with Mr. Weber?</p> <p>5 A Yes.</p> <p>6 Q So all of your communications by text</p> <p>7 message with Mr. Weber from 2017 to 2019 are</p> <p>8 reflected here?</p> <p>9 A Yes.</p> <p>10 Q All right. If you look at page NBI 4061,</p> <p>11 which is the second page, if you sent</p> <p>12 Sergeant Weber a photo, that's what it would look</p> <p>13 like, right?</p> <p>14 A Yeah.</p> <p>15 Q If you flip the page to 4062. And you</p> <p>16 asked on May 4th, 2017 for information about the</p> <p>17 shooting in 142. Do you see that on 5/4/2017?</p> <p>18 A Yes.</p> <p>19 Q And the first thing I wanted to ask you</p> <p>20 was the date there is May 4th, 2017. Do you see</p> <p>21 that?</p> <p>22 A Yes.</p> <p>23 Q The date above that is January 29th,</p> <p>24 2017.</p> <p>25 Do you see that?</p>	<p style="text-align: right;">Page 370</p> <p>1 A After looking at the messages, yes.</p> <p>2 Q What was the circumstances of that</p> <p>3 shooting?</p> <p>4 A I don't know. But I believe I heard,</p> <p>5 because I'm almost above this room, and I heard,</p> <p>6 you know, few gunfire. And we call and also the</p> <p>7 911. And then I send him a message because I</p> <p>8 didn't see him there. Because I know he's coming</p> <p>9 with the next, you know, hour, two hour, so I asked</p> <p>10 him to check it. And he came and -- I think he</p> <p>11 came to the property. And then he called the</p> <p>12 police officer and I think he talked with them.</p> <p>13 Q And concluded that it was prostitution</p> <p>14 related?</p> <p>15 A I am not hundred percent.</p> <p>16 Q Well, look at page NBI 4063, please,</p> <p>17 where it says at the top: So far all I know is</p> <p>18 that it was prostitution related.</p> <p>19 Do you see that?</p> <p>20 A Yeah.</p> <p>21 Q Do you agree it appears that he concluded</p> <p>22 the shooting was related to prostitution in room</p> <p>23 142?</p> <p>24 A Looking at the messages, yes, he</p> <p>25 concluded that way.</p>
<p style="text-align: right;">Page 369</p> <p>1 A Yes.</p> <p>2 Q So does that mean that you didn't</p> <p>3 exchange any texts for the entire month of</p> <p>4 February, March, April with Sergeant Weber?</p> <p>5 A I guess you're right.</p> <p>6 Q So about 90 days plus you did not send or</p> <p>7 receive any text messages from Sergeant Weber; is</p> <p>8 that right?</p> <p>9 A Right.</p> <p>10 Q And I think you had told me that</p> <p>11 Sergeant Weber would not prepare reports</p> <p>12 documenting what he had done on his shift; is that</p> <p>13 right?</p> <p>14 A Right.</p> <p>15 Q He would not submit any written</p> <p>16 documentation to you?</p> <p>17 A No.</p> <p>18 Q Or to the hotel?</p> <p>19 A No.</p> <p>20 Q And so unless there's a text message,</p> <p>21 there's nothing in writing from him to you or the</p> <p>22 hotel about his shift; is that right?</p> <p>23 A Right.</p> <p>24 Q Do you recall a shooting in room 142 in</p> <p>25 May 2017?</p>	<p style="text-align: right;">Page 371</p> <p>1 Q Do you have any further understanding of</p> <p>2 what caused that shooting in room 142?</p> <p>3 A No. When he take over, then at the end</p> <p>4 he just, you know, if we meet, he give me the</p> <p>5 report what's going on or he send a message, you</p> <p>6 know, this is what happened.</p> <p>7 Q It looks like your next text message with</p> <p>8 him is a month later on June 4th; is that right?</p> <p>9 A June 4th, yeah.</p> <p>10 Q So it looks like about 30 days pass</p> <p>11 before you have any further written</p> <p>12 correspondence --</p> <p>13 A Right.</p> <p>14 Q -- with him?</p> <p>15 A Right.</p> <p>16 Q So you don't send him any messages about</p> <p>17 what steps are you taking to try to prevent</p> <p>18 commercial sex activity on the property; is that</p> <p>19 right?</p> <p>20 A No, I don't send him that. We talk about</p> <p>21 it because we meet quite often, you know. And</p> <p>22 that's the year when I need to stay there and fix</p> <p>23 those violations, so I was there, you know, more</p> <p>24 and I see him or other officer.</p> <p>25 Q Were you not there as much in 2016?</p>

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<p style="text-align: right;">Page 380</p> <p>1 A Yes. 2 Q In the back parking lot -- 3 A Back parking lot -- 4 Q -- generally? 5 A -- yes. 6 Q What about Weber, is he generally in the 7 back or the front? 8 A He is -- I see him, he is -- he park 9 always at the front. 10 Q He always parks in the front? 11 A Almost always, yes. 12 Q Do you know why they do it differently? 13 A I don't know. 14 Q It is not something you have asked for? 15 A No. 16 Q They do that on their own? 17 A Yeah. 18 Q Mr. Shareef, when we talked in February I 19 had asked you about background checks of employees 20 at the United Inn and Suites. I have not seen any 21 documents in your production showing background 22 checks on employees or workers or laborers or 23 independent contractors at the hotel. I assume 24 that means there is no such documentation of 25 background checks?</p>	<p style="text-align: right;">Page 382</p> <p>1 you handwrite them and somebody typed this for you? 2 A No. No. They gave us the -- I believe 3 they gave us some links, you know, click on these 4 links and go to certain website. And some of them 5 I think they give them to us there and I retype it. 6 Because there are -- on those notes I see there's 7 lot of things repeated, so I type my basically own 8 notes plus some of the notes coming from the 9 websites.</p> <p>10 Q And you're saying that you think you 11 attended meetings related to the DeKalb County Code 12 Enforcement?</p> <p>13 A There was a meeting, you know, 14 collaboration with the Code Enforcement and the 15 Tourism, DeKalb County Tourism Department.</p> <p>16 Q Was this relating to the DeKalb County 17 Hotel, Motel Ordinance in 2017?</p> <p>18 A Yes.</p> <p>19 Q DeKalb County hosted meetings for DeKalb 20 hotel owners and operators to attend --</p> <p>21 A Right.</p> <p>22 Q -- to talk about the ordinance?</p> <p>23 A Yes.</p> <p>24 Q And at those meetings, is it more than 25 one meeting or just one meeting?</p>
<p style="text-align: right;">Page 381</p> <p>1 A Well, I don't know. I couldn't find 2 anything. 3 (Plaintiff's Exhibit 29 marked)</p> <p>4 BY MR. BOUCHARD:</p> <p>5 Q Mr. Shareef, I'm showing you Plaintiff's 6 Exhibit 29, and this is Bates stamped NBI 625 to 7 NBI 631.</p> <p>8 Do you see that?</p> <p>9 A Yes.</p> <p>10 Q This appears to be a compilation of 11 documents and articles, but it was produced to us, 12 the Plaintiffs, by Northbrook Industries, Inc. So 13 can you tell me what this is, what these series of 14 documents are about human trafficking.</p> <p>15 A Yeah. These are like I think -- I'm not 16 sure which -- what date but this is almost 17 happening on the -- when we got these violations 18 and we have few meetings with the DeKalb County 19 Police and the county Tourism Department. And they 20 have some of the material given to us and then some 21 of the links, website they give it to us to read 22 the material and share with the staff. So this is 23 what I -- this is kind of my notes I can say.</p> <p>24 Q Help me understand that. Did you bring a 25 computer and you typed these notes yourself or did</p>	<p style="text-align: right;">Page 383</p> <p>1 A I attend maybe two meetings.</p> <p>2 Q At those meetings at least one of the 3 topics was the ordinance for the hotels --</p> <p>4 A Right. Right.</p> <p>5 Q -- in DeKalb County --</p> <p>6 A Uh-huh (affirmative).</p> <p>7 Q -- that the DeKalb County commission was 8 talking about passing?</p> <p>9 A Right.</p> <p>10 Q And another topic was human trafficking?</p> <p>11 A Yes.</p> <p>12 Q Were there other topics at these 13 meetings?</p> <p>14 A Other topics are how to go into their -- 15 in their website, register yourself, you can get 16 more customers so they can expose you with the 17 other events in the DeKalb County so you can find 18 groups coming from the other cities to have their 19 family gathering or whatever their visit, visitors 20 who are contacting them. So it is basically 21 helpful to find more customers, so these are the 22 topics there.</p> <p>23 Q The DeKalb County Tourism Department was 24 trying to help hotels develop business?</p> <p>25 A More business, yes.</p>